

1 **KEITH D. KARNES**, OSB # 033521

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3 Rank & Karnes Law, P.C.

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8 UNITED STATES BANKRUPTCY COURT
9 FOR THE DISTRICT OF OREGON
10

11 In re:

12 SILVER MOUNTAIN FARMS, LLC

13 Debtor-in-possession,
14
15

Case No.: 20-60777-pcm12

DECLARATION OF DANIEL HAFNER IN
SUPPORT OF FIRST DAY MOTIONS

16
17 I, Daniel Hafner, declare that:

18 I am the sole owner of Silver Mountain Farms, LLC ("the Farm"). I have filed chapter
19 12 bankruptcy for the Farm because my loans with KeyBank and Wilbur-Ellis have come due
20 and payable in full and I have not been able to obtain replacement financing.
21

22 Silver Mountain Farms runs a grass seed and hazelnut farm that currently has five
23 employees plus me providing the labor. The outstanding wages for the employees are
24 approximately \$1,140. I need spot spraying, working ground maintaining equipment so that I
25 can have a productive harvest this year. However, the only money that is available to me is the
26 money upon which KeyBank and Wilbur-Ellis have a lien.
27

28 DECLARATION OF DANIEL HAFNER IN SUPPORT OF FIRST DAY MOTIONS- 1

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2
3 I believe the Farm can repay all creditors in full over time. The banks had previously
4 renewed the farm's loans until this year. Now, the lenders are unwilling to renew the farm's
5 loans.
6

7 I hereby declare that the above statement is true to the best of my knowledge and belief,
8 and that I understand it is made for use as evidence in court and is subject to penalty for perjury.
9

10 Dated March 17, 2020.

/s/ Daniel Hafner
Daniel Hafner

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28 DECLARATION OF DANIEL HAFNER IN SUPPORT OF FIRST DAY MOTIONS- 2

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CERTIFICATE OF SERVICE

I, Keith Karnes, certify that I filed the forgoing document via ECF which will in turn serve:

KEITH D KARNES on behalf of Debtor-in-possession Silver Mountain Farms, LLC
keith@rankkarneslaw.com patricia@rankkarneslaw.com
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Virginia Andrews Burdette
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Gina Anne Johnnie
gina@shermlaw.com beth@shermlaw.com darlene@shermlaw.com

US Trustee, Eugene
USTPRegion18.EG.ECF@usdoj.gov

via First Class mail:

KeyBank National Association
Christopher M Gorman, President
127 Public Square
Cleveland, OH 44114-1217

Virginia Burdette, Trustee
5506 6th Ave S, Suite 207
Seattle, WA 98108-2553

Wilbur-Ellis Company
Registered Agent Solutions, Inc., RA
8130 SW Beaverton-Hillsdale Highway
Portland, OR 97225-1845

US Trustee, Eugene
405 E 8th Avenue #1100
Eugene, OR 97401

Daniel Hafner
PO Box 53
Lyons, OR 97358

DATED March 18, 2020.

/s/ Keith D. Karnes
Keith D. Karnes, OSB # 033521
Attorney for Debtor-in-possession

DECLARATION OF DANIEL HAFNER IN SUPPORT OF FIRST DAY MOTIONS- 3

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